Compilation of Public Comments
Castor Creek, Bayou Chauvin, Crew Lake
TMDLs for Oxygen-Demand

Commenter	Date received	Waterbody (ies)	Summary of comments	Summary of LDEQ responses
Gaston Lanaux III, Weyerhaeuser Co.	1/29/02	Castor Creek Watershed	A 75% reduction in loading is required to meet the current DO standard of 5mg/L. There is some concern with the attainability of the proposed load reductions because the land in this watershed is 57% forestland. The new standards burden should not be placed on the back of forest landowners.	LDEQ acknowledges that much progress has been made in the area of forestry best management practices. It is not LDEQ's intent to place the entire burden of load reduction upon forest landowners. The load reductions calculated through the TMDL models will serve as goals for our existing programs. LDEQ recognizes that the large reductions in loading may not be achievable considering the land uses for this watershed. LDEQ will continue to examine the existing water quality standard for dissolved oxygen and the suitability of a seasonal DO standard for Castor Creek and other low-flow, dystrophic streams in Louisiana.
Cecil Crawford	1/28/02	Castor Creek Watershed	The proposed load reductions to meet the current DO standards as well as those reductions proposed to meet the suggested revised DO standards raise some concern as to the attainability of either load reduction.	See above response.

		Castor Creek Watershed	The data used to calculate this TMDL were collected during periods of prolonged drought and these results are indicative of abnormal conditions. Lack of rain indicates no stream flow, therefore no reaeration or movement to cool the stream. It is recommended that the stream be reassessed after a period of normal rainfall.	Sampling under more "normal" conditions would be preferable, but we are required by law to consider critical conditions for TMDLs. Sampling had to occur during 1999 and 2000 regardless of the weather conditions in order to fulfill the court-ordered TMDL completion schedule. TMDLs can be revised at any time, so if more data become available the TMDL will be adjusted accordingly.
W.F. Wieger, forester	2/5/02	Castor Creek Watershed	The model used in this TMDL is deficient and the data are inappropriate because samples were taken during abnormal conditions. Drought increases the benthic load in a stream due to increases in loose, dry particles available to wash into the stream, and there is also a lack of sufficient streamflow to wash the materials downstream. The stream needs to be reassessed during periods of weather normality.	LDEQ was under a strict timeline and had to conduct the sampling during the drought as a result. Conditions were dry, but the data collected was utilized to populate the TMDL models to represent critical conditions. This in-stream data produces a more accurate model than estimates and default values would produce. Alternatives to current modeling and assessment protocols with respect to critical conditions are being considered.
		Castor Creek Watershed	Man-made load generation impacts make up only 6% of the watershed area, therefore the proposed reductions are unattainable. Load reductions of 55-75% would be imposed upon 6% of the total landscape, thus resulting in minimal environmental benefit.	LDEQ is working to establish more appropriate criteria through the use attainability analysis process. A criteria change has been proposed for Castor Creek but has not been approved by the USEPA. More data will be needed to support the recommended criteria revision for Castor Creek.
William Richardson, Chancellor LSU AgCenter	1/2002	Bayou Chauvin	A DO standard of 5mg/L is unachievable since it requires 80-100% reduction in man-made pollution in addition to reduced discharge limits on point sources. The data collected was done so during extreme drought conditions. The DO standard should be revised to 3mg/L and new data should be collected during normal weather patterns.	LDEQ will continue to pursue revisions to the water quality standards as needed. As a man-made waterbody, Bayou Chauvin is a candidate for a site-specific standard. LDEQ will work toward a revision to the dissolved oxygen standard for this classification of waterbodies. LDEQ understands your concerns but had to conduct sampling during the dry conditions. The data collected was used to populate the models to represent critical conditions. The in-stream data produces a more accurate model than estimates and default values would produce.

		Castor Creek Watershed	The current DO standard of 5mg/L is unattainable, and a use attainability analysis should be submitted for the reduction of the standard to 3mg/L. Upon close examination of the data, there is a clear indication that drought has made the data collected in these samples invalid. Data should be recollected during normal conditions and the TMDL recalculated.	See above response.
		Crew Lake	The 95% reduction in man-made nonpoint source pollutants required in this TMDL is unattainable. New data should be collected after a period of normal weather patterns. Restrictions should be placed on the individual home septic systems around the lake to reduce the nutrient and bacteria loadings to the lake.	See above response.
C.J. Ledoux, Town & Country Service Co., Inc.	1/10/02	Bayou Chauvin	At one time, Town and Country Service Co. was discharging into Bayou Chauvin from four separate oxidation ponds. The ponds have since been closed and discharges come from the new $1.6 million Oakwood Treatment Plant. Rates were just raised for the customers because of the new plant. Implementation of this TMDL would require even higher rates for our customers.	LDEQ is grateful for the information about the closing of the oxidation ponds and the new Oakwood Treatment Plant because this was taken into account in the development of the TMDL. The TMDL includes the discharge from Oakwood Pond #2 only.
C.A. "Buck" Vandersteen, Exec. Director, LA Forestry Assoc.	1/31/02	Castor Creek	Concern is raised over the modeling techniques used and attainability of the findings. The proposed TMDL calls for a 75% load reduction to meet the current DO standard of 5mg/L (summer) and 55% load reduction to meet the proposed DO standard of 3mg/L. The land uses in this watershed are over 94% low man-made load generating areas, so one must question where the load reductions will come from.	LDEQ agrees the DO criterion of 5mg/L is not attainable year-round in many of Louisiana's slow-moving streams. A criteria change (through the use attainability analysis process) has been proposed but has not been approved by the U.S. EPA. More data will be needed to support the recommended criteria revision for Castor Creek. LDEQ is aware of the diligent efforts made by the LFA to promote the use of best management practices (BMPs), and LDEQ applauds your efforts and encourages the continuation of your forestry training programs.

		Castor Creek	Data were collected during periods of prolonged drought. No measurable stream flow was detected at the headwater at the time of sampling. Drought increases the benthic load in a stream due to the increase in loose dry material available to wash into the stream. Insufficient stream flow to wash the material downstream builds up a continuously increasing blanket of fresh material on the stream bottom, requiring oxygen to reach stability. Lack of rain meant no stream flow and thus no reaeration or movement to cool the stream.	LDEQ understands your concern about the sampling of these streams during drought conditions to collect data for the development of TMDLs. It was necessary to conduct the sampling during 1999 and 2000 due to the court-ordered schedule for TMDL completion. The data collected was utilized to populate the TMDL models to represent critical conditions. This in-stream data produces a more accurate model than estimates and default values would produce. Alternatives are being considered to current modeling and assessment protocols with respect to critical conditions.